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August 23, 2023

Hon. Barbara C. Moses, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007
VIA ECF

MEMO ENDORSED

Re: Leitch et al. v. Amazon Services Com LLC
SDNY Docket No.: 22-cv-06121- BCM

Dear Judge Moses,

I represent Plaintiffs in this matter. This is a joint request for an extension of time for the parties to file a letter respecting continued discovery disputes (the “Letter”) from August 24, 2023 to Tuesday, September 5, 2023. This is the fourth request of this type, the previous ones having been granted for good cause. There is no prejudice to any party.

As we previously advised Your Honor, the scope of continued discovery as well as the scope of Plaintiffs’ pending motion to compel discovery rest in large part on a discussion between Plaintiffs’ computer expert and Defendant’s high level employee familiar with the time keeping system. Owing to circumstances beyond counsel’s control, the discussion scheduled for last Friday had to be adjourned. We expect that it will take place within the next seven days. After the discussion, the undersigned will consult with Plaintiffs’ expert with a view to limiting the scope of the discovery motion pending before Your Honor. Counsel for both parties believe that this additional delay will result in savings in the scope of discovery and judicial resources.

Wherefore, the parties respectfully request that Your Honor permit them to file the Letter by Tuesday, September 5, 2023.

Respectfully submitted,

/s/ Robert Wisniewski
Robert Wisniewski

cc: All counsel of record via ECF

Application GRANTED. The parties' letter shall be due **September 5, 2023**. SO ORDERED.



Barbara Moses
United States Magistrate Judge
August 24, 2023